UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10



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OFFICE OF ECOSYSTEMS, TRIBAL AND PUBLIC AFFAIRS

Mary Romero, Project Manager U.S. Army Corps of Engineers, Alaska District Regulatory Division P.O. Box 6898 JBER, Alaska 99506-0898

Subject:

The Alaska Stand Alone Gas Pipeline Final Environmental Impact Statement

EPA Project No. 09-054-DOD

Dear Ms. Romero:

The EPA has reviewed the U.S. Army Corps of Engineers (Corps) Final Environmental Impact Statement (EIS) for the Alaska Stand Alone Gas Pipeline Project. Our comments are provided in accordance with our authorities pursuant to the National Environmental Policy Act (NEPA), Section 309 of the Clean Air Act, the Clean Water Act, as well as our responsibilities as a cooperating agency.

In our previous comments to the Corps, we provided recommendations regarding potential environmental impacts to a designated air quality non-attainment area, an impaired water body, sole source protection areas, wetlands, as well as other matters evaluated in the EIS. Based on our review of the Final EIS, we acknowledge that many of our recommendations have been addressed. The mitigation measures described in the Final EIS would further minimize the environmental impacts associated with the construction and operation of this project.

The least environmentally damaging practicable alternative to avoid and minimize impacts to the Minto Flats wetlands has not been identified. Additional analysis pursuant to the Clean Water Act §404(b)(1) Guidelines should be conducted prior to issuing a Record of Decision for the Alaska Stand Alone Pipeline Project. We understand that the Corps has formally closed the file pending receipt of a complete permit application from the Alaska Gasline Development Corporation. When the permitting process resumes, the Corps will need to decide whether a supplemental NEPA analysis is warranted.

It has been a pleasure serving as a cooperating agency on the development of this EIS. We commend the Corps and the EIS development team for the analysis and evaluation that has been undertaken for the ASAP project. We are encouraged that this document will serve the Corps and other agencies in making an informed decision.

Thank you for the opportunity to review the Final EIS for the Alaska Stand Alone Gas Pipeline Project. If you have any questions regarding this letter, please contact me at (206) 553-1601 or by email to reichgott.christine@epa.gov or you may contact Mark Jen of my staff in Anchorage at (907) 271-3411 or by email to jen.mark@epa.gov.

Sincerely,

Buth B. Heicht

Christine Reichgott, Manager

Environmental Review and Sediment Management Unit